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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Arthur I. Watson	§	Group Art Unit: 3676
Serial No.: 10/711,631	§	Examiner: Fuller, Robert Edward
Filed: September 29, 2004	§	
For: System and Method for a Combined Motor and Protector	§	Atty Docket: 68.0417

Assistant Commissioner
for Patents
Washington, D.C. 20231

CERTIFICATE OF MAILING
37 C.F.R. 1.8

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January 6, 2010 — Robert A. van Someren
Date — Robert A. van Someren

Assistant Commissioner:

REPLY BRIEF PURSUANT TO 37 C.F.R. §§ 41.31 AND 41.41

This Reply Brief is being filed in response to the Examiner's Answer mailed November 12, 2009.

1. **REAL PARTY IN INTEREST**

The real party in interest is Schlumberger Technology Corporation, the Assignee of the above-referenced application as recorded at Reel No. 016075, Frame No. 0353.

2. **RELATED APPEALS AND INTERFERENCES**

Appellant is unaware of any other appeals or interferences related to this Appeal. The undersigned is Appellant's legal representative in this Appeal. Schlumberger Technology

Corporation, the Assignee of the above-referenced application, will be directly affected by the Board's decision in the pending appeal.

3. STATUS OF CLAIMS

In the Examiner's Answer, the rejection of claims 6, 20, 39 and 40 was withdrawn and these claims were indicated as allowed (claims 39, 40) or allowable (claims 6 and 20). Appellant thanks the Examiner for withdrawing the rejection of these claims. Subsequent to the Examiner's Answer, claims 1, 3-5, 7-11, 13-18, 22-35, 43-45 and 47-51 remain rejected by the Examiner as noted in the final Office Action dated January 16, 2009. Claims 2, 12, 21, 36-38, 41, 42, 46 and 52-56 were canceled prior to the January 16, 2009 final Office Action. The rejection of claims 1, 3-5, 7-11, 13-19, 22-35, 43-45 and 47-51 remains subject to the present appeal.

4. STATUS OF AMENDMENTS

No amendments were made to the claims after the final Office Action dated January 16, 2009. Similarly, no amendments were made in response to the previous Office Action dated July 10, 2008. Prior to the final rejection, amendments to the claims were made in the Reply and Amendment mailed March 5, 2008 in response to the December 13, 2007 Office Action.

5. SUMMARY OF THE CLAIMED SUBJECT MATTER

a.) Independent Claim 1

Independent claim 1 is directed to a system (20) used for producing oil. *(See, for example, paragraph 0023, page 5, lines 14-18).* The system (20) comprises a submersible pump (36) and a motive unit (42) that powers the submersible pump (36). The motive unit (42) is designed as a single device having a motor section (48) and a motor protector section (50) which seals the motor section (48) from surrounding fluid while accommodating thermal expansion of an internal lubricating fluid during production of oil. *(See, for example, paragraph 0026, page 6,*

lines 8-18; and paragraph 0028, page 7, lines 2-6). The motive unit (42) comprises a plurality of bearings (60) having self lubricating bushings (132). *(See, for example, paragraph 0029, page 7, lines 16-18; and paragraph and 0036, page 12, lines 15-21).* The motor section (48) and the motor protector section (50) comprise a motor section shaft (54) and a motor protector section shaft (56), respectively. *(See, for example, paragraph 0028, page 7, lines 4-9).* The motor section shaft (54) and the motor protector section shaft (56) are axially affixed to each other with respect to a longitudinal axis of the motive unit (42). *(See, for example, paragraph 0030, page 8, lines 1-18).*

b.) Independent claim 16

Independent claim 16 is directed to a method of forming a motive unit (42) for a submersible pumping system (22). *(See, for example, paragraph 0026, page 6, lines 8-13).* The method comprises connecting a motor section shaft (54) to a protector section shaft (56) to form an axially affixed connection. *(See, for example, paragraph 0030, page 8, lines 1-18).* A sealed housing (46) is placed around the axially affixed connection to form a combined motor section 48 and protector section 50. *(See, for example, paragraph 0032, page 9, lines 8-15).* The combined motor section (48) and protector section (50) are prefilled with a lubricating fluid prior to delivery of the combined motor section (48) and protector section (50) to a wellbore (24) location. *(See, for example, paragraph 0027, page 6, lines 19-28; paragraph 0041, page 14, lines 24-27).* Additionally, the method comprises forming a protector section head (122) having lateral sand escape holes (120) above a protector section bearing (60). *(See, for example, paragraph 0035, page 11, lines 10-25).*

c.) Independent Claim 26

Independent claim 26 is directed to a method for protecting a submersible motor (48) that comprises constructing a motive unit (42), having a longitudinal axis, for use in a submersible pumping system (22) with a motor section (48) and a protector section (50) combined. *(See, for example, paragraph 0028, page 7, lines 1-11).* The motive unit (42) is delivered to an oil

production well (24) as a single unit. *(See, for example, paragraph 0027, page 6, lines 19-28).* The method further comprises providing the motive unit (42) with a plurality of oil communication holes (168) deployed at a nonzero angle (166) with respect to a longitudinal axis (58) such that the nonzero angle (166) of the plurality of oil communication holes (168) corresponds with an angle at which the motive unit (42) is positioned relative to vertical during filling of the motive unit (42) with oil. *(See, for example, paragraph and 0041, page 14, line 24, through page 15, line 13).*

d.) Independent claim 39

Independent claim 39 is directed to a system (20) for producing a fluid. The system comprises a motor section (48) having an electrical cable connection (67). *(See, for example, paragraph 0029, page 7, lines 25-27).* The electrical cable connection (67) has a terminal block (100) that is movable between a sealed position and an open position which enables fluid communication between a connection interface (96) and an interior volume (98) of the motor section (48). *(See, for example, paragraph 0033, page 9, line 16, through page 10, line 15).* A spring (108) is positioned to spring bias the terminal block (100) toward the sealed position. *(See, for example, paragraph 0034, page 10, line 22-24).* A dielectric gasket (116) is positioned to limit electrical tracking. *(See, for example, paragraph 0034, page 11, lines 4-9).*

e.) Independent Claim 43

Independent claim 43 is directed to a system (20) used for producing a fluid. *(See, for example, paragraph 0023, page 5, lines 14-18).* The system (20) comprises a motive unit (42) that powers a submersible pump (36). *(See, for example, paragraph 0026, page 6, lines 8-18).* The motive unit (42) comprises a bearing (60) disposed about a drive shaft (54 or 56), wherein the journal bearing (60) has a replaceable sleeve (62) press fit onto the drive shaft (54 or 56) with a tolerance ring (134). *(See, for example, paragraph 0037, page 12, line 24, through page 13, line 7).*

f.) Independent Claim 51

Independent claim 51 is directed to a system (20) for use in pumping a fluid from a well (24). *(See, for example, paragraph 0023, page 5, lines 14-18; and paragraph 0024, page 5, lines 18-22).* The system (20) comprises an electric submersible pumping system (36) having a motor section (48) and a motor protector section (50). *(See, for example, paragraph 0028, page 7, lines 2-6).* At least one of the motor section (48) and the motor protector section (50) comprises a bubble sump (180) which maintains any released gases in a dedicated volume (184). *(See, for example, paragraph 0044, page 16, lines 8-14).* Additionally, a relief valve system (190) is placed in communication with the dedicated volume (184) to vent gas from the bubble sump (180). *(See, for example, paragraph 0046, page 17, lines 8-20).*

6. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

a.) Whether claims 16-19, 22, 25-28 and 30-32 are unpatentable under 35 U.S.C. § 102(b) as anticipated by the Shaw et al. reference, US Patent No.: 4,667,737.

b.) Whether claims 39 and 40 are unpatentable under 35 U.S.C. § 102(b) as anticipated by the Shilman reference, RU 2162272 C1.

c.) Whether claims 47-51 are unpatentable under 35 U.S.C. § 102(e) as anticipated by the Du et al. reference, US Publication No.: 2005/0087343.

d.) Whether claims 1, 3-5, 7, 8, 15, 23 and 33 are unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Scarsdale reference, US Patent No.: 6,290,430.

e.) Whether claim 6 is unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Scarsdale reference and further in view of the Shilman reference.

f.) Whether claims 9-11 are unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Scarsdale reference and further in view of the Kinsinger reference, US Patent No.: 6,091,175.

g.) Whether claim 13 is unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Scarsdale reference and further in view of the Vandevier reference, US Patent No.: 4,521,708.

h.) Whether claim 14 is unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Scarsdale reference and further in view of the Howell et al. reference, US Patent No.: 6,602,059.

i.) Whether claim 20 is unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Shilman reference.

j.) Whether claim 29 is unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference.

k.) Whether claim 34 is unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Vandevier reference.

l.) Whether claims 24 and 35 are unpatentable under 35 U.S.C. § 103(a) as being obvious over the Shaw et al. reference in view of the Howell et al. reference.

m.) Whether claims 43-45 are unpatentable under 35 U.S.C. § 103(a) as being obvious over the Kinsinger reference in view of the Yamamoto et al. reference, US Patent No.: 6, 854, 556, and the Kurokawa et al. reference, US Patent No.: 6,394,220.

7. ARGUMENT

Appellant continues to rely on the arguments presented in the Appeal Brief filed under Certificate of Mailing on July 24, 2009. However, certain new issues/arguments raised in the Examiner's Answer are addressed below.

a.) Rejection of claims 16-19, 22, 25-28 and 30-32 as unpatentable under 35 U.S.C. § 102(b) for being anticipated by the Shaw et al. reference, US Patent No.: 4,667,737.

- Claims 16-19, 22, 25

In the Response to Argument section on page 15 of the Examiner's Answer, the element of independent claim 16 referring to "an axially affixed connection" is addressed. A statement is made that "appellant incorrectly assumes that 'axially affixed' necessarily implies that the shafts are fixed with respect to the longitudinal axis of the motive unit". However, regardless of how one would define a longitudinal axis, the claim language of independent claim 16 clearly refers to an "axially affixed connection". The only reasonable interpretation of axially affixed is that the motor section shaft and the protector section shaft are affixed with respect to each other in an axial direction, i.e. along the axes of the shafts. The claim language does not refer to the shafts being rotationally affixed or transversely affixed as discussed in the Examiner's Answer but instead refers to the shafts as having an axially affixed connection.

The proper meaning of the claim terminology appears to be affirmed on page 15 of the Examiner's Answer which further states in characterizing the Shaw et al. reference: "note that, when fully assembled, the shafts are prevented from moving with respect to the longitudinal axis by virtue of bolt connection 1c". This statement appears to demonstrate that the shafts in the Shaw et al. design are not axially affixed. Instead, adjacent components in Shaw et al. are connected by traditional flanges through which the bolts 1c extend. The flanges and bolts 1c are

necessary because the Shaw et al. shafts do not have an "axially affixed connection" as recited in independent claim 16 along with its dependent claims 17-19, 22 and 25.

With respect to independent claim 16, the Examiner's Answer further states: "examiner maintains that the motive unit is prefilled prior to delivery to a wellbore location". (See Examiner's Answer, page 16). However, Appellant respectfully maintains that this is an improper interpretation of the language of claim 16 which states that pre-filling of the combined motor section and protector section is "prior to delivery of the combined motor section and protector section to a wellbore location".

Throughout the specification of the present application, the combined motor section and protector section are described as allowing prefilling of lubricating fluid before delivery of the combined unit to a wellbore location. For example, paragraph 0022 states that such combination can be used "to eliminate re-filling of the unit with oil in the field" and paragraph 0027 states that the combined unit enables the motive unit to be "accurately prefilled at a factory with no oil loss in the field due to assembly of separate components". By way of further example, paragraph 0041 recites that the combined motor section and protective section "enables pre-filling of the unit with internal fluid without concern for later loss of fluid". The language of the specification thoroughly supports and describes the concept of prefilling a lubricating fluid prior to delivery of the combined motor section and protector section to a wellbore location.

The Shaw et al. reference does not describe a system which enables such "prefilling". Therefore, the current rejection is only based on the Shaw et al. pumping system containing oil as it moves down into a wellbore. However, moving the Shaw et al. submersible pumping system down through a wellbore to a location in the wellbore does not anticipate "prefilling the combined motor section and protector section with a lubricating fluid prior to delivery of the combined motor section and protector section to a wellbore location" as recited in independent claim 16. (Emphasis added) Appellant respectfully submits that interpretation of the subject claim element in a manner which allows a rejection based on the Shaw et al. reference flies in the

face of the plain meaning of the claim language and is contrary to the supporting description of that claim element throughout the specification.

The Shaw et al. reference fails to disclose or suggest several elements of independent claim 16. Therefore, dependent claim 16 and its corresponding dependent claims are believed to be improperly rejected under 35 USC 102(b), and the rejection under 35 USC 102(b) should be withdrawn.

- **Claims 26-28 and 30-32**

In the Response to Argument section on page 16 of the Examiner's Answer, the element of independent claim 26 referring to delivering the motive unit "to an oil production well as a single unit" is addressed. As discussed above with respect to independent claim 16, throughout the specification of the present application, the combined motor section and protector section are described as allowing prefilling of a combined motive unit with lubricating fluid and then delivering the motive unit to an oil production well as a single unit. As discussed above, paragraph 0022 states that such combination can be used "to eliminate re-filling of the unit with oil in the field" and paragraph 0027 states that the combined unit enables the motive unit to be "accurately prefilled at a factory with no oil loss in the field due to assembly of separate components". Paragraph 0041 also recites that the combined motor section and protective section "enables pre-filling of the unit with internal fluid without concern for later loss of fluid". The language of the specification thoroughly supports and describes this concept of prefilling a lubricating fluid prior to "delivering the motive unit to an oil production well as a single unit". Moving the Shaw et al. pumping system through a wellbore is not the same and does not suggest "delivering the motive unit to an oil production well as a single unit" as recited in independent claim 26. In fact, the Shaw et al. design utilizes traditional flanges and bolts 1c for assembly at the production well.

With respect to independent claim 26, the Examiner's Answer further states the Shaw et al. reference "discloses oil communication holes deployed at a nonzero angle with respect to the

longitudinal axis" (see page 17) and that the claim element "*corresponds*" is "essentially meaningless in this context" (see page 18). However, Appellant respectfully submits the claim term "*corresponds*" does and must have meaning. Claim 26 specifically recites that oil communication holes are deployed at a nonzero angle with respect to the longitudinal axis such that "the nonzero angle of the plurality of oil communication holes corresponds with an angle at which the motive unit is positioned relative to vertical during filling of the motive unit with oil".

The plane language of claim 26 requires <u>correspondence</u> between the angle of the plurality of oil communication holes and the angle at which the motive unit is filled with oil. The Shaw et al. reference simply fails to provide any disclosure or suggestion related to this approach to filling. In fact, **if** the Shaw et al. reference discloses a conventional system which is assembled as components are delivered downhole, the system would not be capable of positioning at a nonzero angle corresponding with oil communication holes. The wellbore and deployment equipment would block such approach.

The Shaw et al. reference does disclose a variety of internal fluid flow paths at various, different angles; but the reference appears to lack any disclosure or teaching related to providing oil communication holes deployed at a nonzero angle that corresponds with an angle at which the motive unit is positioned during filling. In fact, the Shaw et al. reference appears to disclose just the opposite by illustrating flow passages at a variety of <u>different</u> angles. In other words, there can be no correspondence with a filling angle.

Accordingly, independent claim 26 and its corresponding dependent claims 27-28, 30-32 are believed to be improperly rejected under 35 USC 102(b) because the cited reference fails to disclose each and every element of the subject claims. Accordingly, the rejection under 35 USC 102(b) should be withdrawn.

c.) Rejection of claims 47-51 as unpatentable under 35 U.S.C. § 102(e) for being anticipated by the Du et al. reference, US Publication No.: 2005/0087343.

- **Claims 47-51**

In the Response to Argument section on page 18, the vent passageway 88 of the Du et al. reference is relied on as being the "bubble sump to maintain any released gases in a dedicated volume" recited in independent claim 51. As stated in pages 18-19 of the Response to Argument section:

> "Examiner points out that the passage is closed off by a valve 94. When the motive unit is being filled with oil, and the venting of gases is desired, valve 94 will be opened (see paragraph 0030), as gases will escape from passage 88. When venting is not needed, such as when the unit is downhole and in use, valve 94 will be closed since opening the valve could cause entry of well fluids into passage 88 (note that chamber 66 is open to well fluids at 72). When valve 94 is closed, then gases (i.e. bubbles) will be stored within passage 88."

However, gases are not stored within vent passage 88 and therefore vent passage 88 should not be construed as a "bubble sump to maintain any released gases in a dedicated volume" as recited in claim 51. In paragraph 0030 of the Du et al. reference, vent passageway 88 is described as a passage for venting air from head section chamber 66. When motor oil is poured into motor protector 16, escaping air is vented through the passageway 88. However, the passageway 88 does not perform as a bubble sump to maintain the released gases. Instead, it continuously vents released gases which must then be routed elsewhere. As illustrated in Figure 3, outlet or valve 94 appears to be a one-way valve, such as a check valve, which allows venting of any gases while preventing backflow of other fluids.

Because the Du et al. reference fails to disclose each and every element of independent claim 51, e.g. "a bubble sump to maintain any released gases in a dedicated volume", the rejection under 35 USC 102(e) must be withdrawn. Claims 47-50 directly depend from independent claim 51 and recite additional unique elements. Accordingly, the rejection of dependent claims 47-50 also should be withdrawn.

d.) Rejection of claims 1, 3-5, 7, 8, 15, 23 and 33 as unpatentable under 35 U.S.C. § 103(a) for being obvious over the Shaw et al. reference in view of the Scarsdale reference, US Patent No.: 6,290,430.

- **Claims 1, 3-5, 7, 8 and 15**

In the Response to Argument section on page 19 of the Examiner's Answer, the element of independent claim 1 referring to "axially affixed to each other with respect to a longitudinal axis of the motive unit" is addressed. Similar to the rejection of independent claim 16, the Shaw et al. reference is relied on as disclosing a motor section shaft and a protector section shaft that are axially affixed. As described above, however, the appropriate interpretation of axially affixed is that the motor section shaft and the protection section shaft are affixed with respect to each other in an axial direction, i.e. along the axes of the shafts. The claim language does not refer to the shafts being rotationally affixed or transversely affixed but instead refers to the shafts as having an axially affixed connection.

The Shaw et al. system appears to be a traditional style system in which components of the pumping system are assembled at the wellbore location via a series of flanges and bolts 1c used to connect housing components. The flanges and bolts 1c are necessary because the Shaw et al. shafts are not "axially affixed to each other with respect to a longitudinal axis of the motive unit" as recited in independent claim 1. Accordingly, no prima facie case of obviousness can be established under 35 USC 103(a) with respect to independent claim 1 and the rejection should be withdrawn.

Claims 3-5, 7, 8, 15, 23 and 33 ultimately depend from independent claim 1 or other independent claims discussed above, and each claim recites additional elements. Accordingly, no prima facie case of obviousness can be established with respect to these dependent claims, and the rejection should be withdrawn.

The remaining rejections have been adequately addressed in the Appeal Brief and no further discussion of those rejections is required. For the reasons provided above and for the reasons provided in the Appeal Brief and throughout the long prosecution history of the present application, Appellant respectfully requests withdrawal of outstanding rejections.

In view of the above remarks, Appellant respectfully submits the Examiner has failed to support the rejection of claims 1, 3-5, 7-11, 13-19, 22-35, 43-45 and 47-51 under either 35 USC 102(b) or (e) or 35 USC 103(a). Therefore, Appellant respectfully requests that the Board find claims 1, 3-5, 7-11, 13-19, 22-35, 43-45 and 47-51 patentable, withdraw all outstanding rejections, and allow claims 1, 3-5, 7-11, 13-19, 22-35, 43-45 and 47-51.

Respectfully submitted,

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8. CLAIMS APPENDIX

1. A system for producing oil, comprising:

a submersible pump; and

a motive unit to power the submersible pump, the motive unit being a single device with a motor section and motor protector section to seal the motor section from surrounding fluid and to accommodate thermal expansion of an internal lubricating fluid during production of oil, wherein the motive unit comprises a plurality of bearings having self lubricating bushings, wherein the motor section comprises a motor section shaft and the motor protector section comprises a motor protector section shaft, the motor section shaft and the motor protector section shaft being axially affixed to each other with respect to a longitudinal axis of the motive unit.

3. The system as recited in claim 1, wherein the motor section shaft and the motor protector section shaft are affixed to each other by a threaded joint.

4. The system as recited in claim 1, wherein the motor section shaft and the motor protector section shaft are affixed to each other by an interference fit.

5. The system as recited in claim 1, wherein the motor section shaft and the motor protector section shaft are affixed to each other by a cross bolt.

6. The system as recited in claim 1, wherein the motive unit comprises an electrical cable connection having a spring biased terminal block movable between a sealed position and an open position.

7. The system as recited in claim 1, wherein the protector section comprises a protector head having a transverse sand escape hole.

8. The system as recited in claim 7, wherein the protector section further comprises a bearing and a shroud protecting the bearing from sand.

9. The system as recited in claim 1, wherein the motive unit comprises at least one journal bearing having a replaceable wear sleeve.

10. The system as recited in claim 9, wherein the replaceable wear sleeve is coupled to a shaft by a key and a retainer.

11. The system as recited in claim 9, wherein the replaceable wear sleeve is coupled to a shaft by a tolerance ring.

13. The system as recited in claim 1, wherein the motor section comprises a rotor bearing having a spring-loaded key.

14. The system as recited in claim 1, wherein the motor section comprises an integral sensor to sense at least one well related parameter.

15. The system as recited in claim 1, wherein the motive unit has an axis and a plurality of oil communication holes deployed at an angle with respect to the axis.

16. A method of forming a motive unit for a submersible pumping system, comprising:

connecting a motor section shaft to a protector section shaft to form an axially affixed connection;

placing a sealed housing about the axially affixed connection to form a combined motor section and protector section;

prefilling the combined motor section and protector section with a lubricating fluid prior to delivery of the combined motor section and protector section to a wellbore location; and

forming a protector section head with lateral sand escape holes disposed above a protector section bearing.

17. The method as recited in claim 16, further comprising moving the combined motor section and protector section to a desired wellbore location.

18. The method as recited in claim 16, wherein connecting comprises utilizing a threaded coupler.

19. The method as recited in claim 16, wherein placing comprises threadably engaging a motor section housing with a protector section housing.

20. The method as recited in claim 16, further comprising providing the motor section with a terminal block that is spring biased toward a sealed position, the terminal block being movable to an open position upon pluggably receiving a cable connector.

22. The method as recited in claim 16, further comprising providing the combined motor section and protector section with a journal bearing having a replaceable wear sleeve.

23. The method as recited in claim 16, further comprising utilizing a bearing with a self lubricating bushing.

24. The method as recited in claim 16, further comprising incorporating an integral sensor into the motor section.

25. The method as recited in claim 16, further comprising forming oil communication holes at an angle with respect to an axis of the combined motor section and protector section.

26. A method for protecting a submersible motor, comprising:

constructing a motive unit having a longitudinal axis for a submersible pumping system with a motor section and a protector section combined;

delivering the motive unit to an oil production well as a single unit; and

providing the motive unit with a plurality of oil communication holes deployed at a nonzero angle with respect to the longitudinal axis such that the nonzero angle of the plurality of oil communication holes corresponds with an angle at which the motive unit is positioned relative to vertical during filling of the motive unit with oil.

27. The method as recited in claim 26, further comprising prefilling the motive unit with a lubricating oil prior to delivering the motive unit to the production well.

28. The method as recited in claim 26, further comprising axially connecting a motor section shaft with a protector section shaft.

29. The method as recited in claim 28, wherein axially connecting comprises providing a single, unitary shaft.

30. The method as recited in claim 28, wherein axially connecting comprises providing a coupling sleeve to create a permanent joint between the motor section shaft and the protector section shaft.

31. The method as recited in claim 26, further comprising forming a sand escape hole in a head of the protector section.

32. The method as recited in claim 26, further comprising utilizing journal bearings having replaceable wear sleeves in the motive unit.

33. The method as recited in claim 26, further comprising utilizing journal bearings having self lubricating bushings in the motive unit.

34. The method as recited in claim 26, further comprising utilizing rotor bearings having spring loaded keys.

35. The method as recited in claim 26, further comprising placing a sensor within the motor section.

39. A system for producing a fluid, comprising:

a motor section having an electrical cable connection, the electrical cable connection having a terminal block movable between a sealed position and an open position that enables fluid communication between a connection interface and an interior volume of the motor section further comprising a spring to spring bias the terminal block toward the sealed position and a dielectric gasket to limit electrical tracking.

40. The system as recited in claim 39, further comprising a protector section permanently coupled to the motor section.

43. A system for producing a fluid, comprising:

a motive unit for driving a submersible pump, the motive unit having a journal bearing disposed about a drive shaft, wherein the journal bearing has a replaceable sleeve, wherein the replaceable sleeve is press fit onto the drive shaft with a tolerance ring.

44. The system as recited in claim 43, wherein the journal bearing comprises a plurality of journal bearings, each journal bearing having a replaceable wear sleeve.

45. The system as recited in claim 43, wherein the motive unit comprises a motor section and a protector section assembled as a single unit.

47. The system as recited in claim 51, wherein the motor section and the protector section are manufactured as a single unit.

48. The system as recited in claim 51, wherein the bubble sump is disposed in the protector section.

49. The system as recited in claim 51, wherein the bubble sump comprises a framework having the dedicated volume for collecting the released gases.

50. The system as recited in claim 51, wherein the framework is disposed above a protector bag.

51. A system for use in pumping a fluid from well, comprising:

an electric submersible pumping system having a motor section and a protector section, wherein at least one of the motor section and the protector section comprises a bubble sump to maintain any released gases in a dedicated volume, further comprising a relief valve system in communication with the dedicated volume to vent gas from the bubble sump.

9. **EVIDENCE APPENDIX**

Not Applicable

10. **RELATED PROCEEDINGS APPENDIX**

Not Applicable